

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	Cr. No. 20-1566 DHU
)	
vs.)	
)	
STACEY YELLOWHORSE,)	
)	
Defendant.)	

**UNITED STATES' OBJECTIONS TO DEFENDANT STACEY YELLOWHORSE'S
WITNESS LIST**

The United States responds objecting to certain witnesses listed on Defendant Stacey Yellowhorse's Witness List. Doc. 178 at 1-4 ("Witness List").

Defendant Yellowhorse has filed a witness list that offers 62 claimed witnesses for the trial of this matter. The first 13 witnesses are apparently law enforcement officers who, according to Yellowhorse, "responded to other, previous incidents of violence regarding Timothy Chischilly." Doc. 178 at 1. She offers another 40 witnesses who she claims are "victims and/or witnesses to other, previous acts of violence by Timothy Chischilly." *Id.* at 3-4. The United States objects to all of these witnesses as Yellowhorse fails to explain how their testimony is relevant in any way to the crime in this case. FRE 401. Rather than addressing her role in the heinous and brutal murder of a young woman, Yellowhorse intends to attempt to show that her co-defendant, Chischilly, was a violent individual who acted in conformity with this trait when he murdered the victim. FRE 404(b). Yellowhorse further seeks to confuse, mislead, and prejudice the jury against Chischilly. FRE 403. With no actual permissible reason to offer the testimony of these witnesses, they should be excluded from trial.

Further, the Government objects to the testimony of Dr. Chitra Ragavhan pursuant to Rules 702, 401, and 403.

Respectfully submitted,

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I hereby certify that a copy of this motion was delivered via CM/ECF to counsel for the defendant.

Electronically filed July 20, 2022

JENNIFER M. ROZZONI